

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

CERTIFICATION OF JESSICA DAVIDSON

JESSICA DAVIDSON, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC. I make this Certification based on personal knowledge and in support of Defendants Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai U.S., Inc.; Princeton Pharmaceutical Inc.; Solco Healthcare U.S., LLC; Teva Pharmaceuticals USA, Inc.; Teva Pharmaceutical Industries Ltd.; Actavis LLC; Actavis Pharma, Inc.; Torrent Pharmaceuticals Ltd.; and Torrent Pharma, Inc. (collectively, the “TPP Trial Defendants”)’s Motion to Exclude the Opinions of Dr. Rena Conti.

2. Attached hereto as Exhibit 1 is a true and correct copy of the February 1, 2024 transcript of the deposition of Rena Conti, taken in MDL 2875. This

document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

3. Attached hereto as Exhibit 2 is a true and correct copy of the November 10, 2021 Expert Declaration of Rena Conti, served in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

4. Attached hereto as Exhibit 3 is a true and correct copy of the February 3, 2023 Damages Expert Declaration of Rena Conti, served in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Supplemental Damages Expert Declaration of Rena Conti, dated December 1, 2023, served in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

6. Attached hereto as Exhibit 5 is a true and correct copy of the February 10, 2022 transcript of the deposition of Rena Conti, taken in MDL 2875.

7. Attached hereto as Exhibit 6 is a true and correct copy of the July 13, 2023 transcript of the deposition of Rena Conti, taken in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

8. Attached hereto as Exhibit 7 is a true and correct copy of Exhibit 9 to the Deposition of Wayne Gibson, taken in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

9. Attached hereto as Exhibit 8 is a true and correct copy of Exhibit 5 to the February 1, 2024 deposition of Rena Conti, taken in MDL 2875.

10. Attached hereto as Exhibit 9 is a true and correct copy of the February 5, 2024 transcript of the deposition of Wayne Gibson, taken in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

11. Attached hereto as Exhibit 10 is a true and correct copy of Exhibit 23 to the February 5, 2024 deposition of Wayne Gibson, taken in MDL 2875.

12. Attached hereto as Exhibit 11 is a true and correct copy of the June 28, 2023 Rebuttal Expert Declaration of Wayne T. Gibson, served in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

13. Attached hereto as Exhibit 12 is a true and correct copy of the January 11, 2022 Memorandum of Law in Support of Defendants’ Motion to Exclude Testimony of Dr. Rena Conti, filed in *In re Novartis & Par Antitrust Litigation*, No. 1:18-cv-04361-AKH, ECF 489 (S.D.N.Y.).

14. Attached hereto as Exhibit 13 is a true and correct copy of the IQVIA Plan Model Type Definitions and Method of Payment Classifications. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

Dated: February 12, 2024

Respectfully submitted,

By: /s/ Jessica Davidson
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
Jessica Davidson (NY Bar No. 6034748)
Liaison Counsel for Manufacturer
Defendants
One Manhattan West
New York, New York 10001
Phone: (212) 735-3222
Fax: (917) 777-3222
jessica.davidson@skadden.com

Attorney for Zhejiang Huahai
Pharmaceutical Co., Ltd., Huahai U.S., Inc.,
Princeton Pharmaceutical Inc., and Solco
Healthcare U.S., LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 12, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson